

DEPOSITION OF ARTHUR ZATARAIN, P.E.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF LOUISIANA
EASTERN DIVISION

WAGO
VERWALTUNGSGESELLSCHAFT
MBH, WAGO KONTAKTTECHNIK
GMBH & CO.KG

Plaintiffs,
CIVIL ACTION

VERSUS NO. 1:11cv756

JUDGE JAMES S. GWIN
ROCKWELL AUTOMATION, INC.

Defendant.

Videotaped deposition of ARTHUR
ZATARAIN, P.E., Artzat Consulting, LLC, 401
Arlington Drive, Metairie, Louisiana 70001,
taken in the Board Room at the Marriott, 555
Canal Street, New Orleans, Louisiana 70130,
reported on Thursday, February 28th, 2013
beginning at 10:06 a.m.



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1 APPEARANCES:

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1 ALSO PRESENT:

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3 LEGAL VIDEO SPECIALIST

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4 **EXAMINATION BY MR. CAMPBELL**6

5 **EXAMINATION BY MR. TANCK**137

6 * * *

7 **INDEX OF EXHIBITS**

8 **Page**

9 Plaintiff's Exhibit No. 124

10 United States Patent, Hennemann, et
11 al., Patent Number: 5,716,241,
12 Date of Patent: Feb. 10, 1998

13 Plaintiff's Exhibit No. 234

14 United States Patent, Beer, et al.,
15 Patent Number: 4,956,747, Date of
16 Patent: Sep. 11, 1990

17 Plaintiff's Exhibit No. 342

18 "Joint Claim Construction and
19 Prehearing Statement"

20 Plaintiff's Exhibit No. 4125

21 Declaration of Arthur Zatarain, Re:
22 Claim Construction of US 5,715,241

23

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1 **S T I P U L A T I O N**

2 It is stipulated and agreed by and
3 between counsel for the parties hereto that
4 the deposition of the aforementioned witness
5 is hereby being taken pursuant to the
6 Federal Rules of Civil Procedure;

7
8 All formalities, with the
9 exception of the reading and signing of the
10 transcript by the witness, are hereby
11 waived;

12
13 All objections, except those as to
14 the form of the question and the
15 responsiveness of the answer, are hereby
16 reserved until such time as this deposition,
17 or any part thereof, may be used or sought
18 to be used in evidence.

19
20 * * *

21
22 DIANE TEWIS CLARK, RPR, RMR, CRR,
23 Certified Court Reporter, State of
24 Louisiana, officiated in administering the
25 oath to the witness.



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1 A couple of times in your answers,
2 you referred to a power bridge. What is a
3 power bridge?

4 **A.** It's not a very specific term, but
5 it would generally mean that part of an
6 assembly that's responsible for carrying
7 some sort of shared power among two or more
8 devices.

9 **Q.** Very good.

10 MR. CAMPBELL:

11 How about we take a ten-minute
12 break.

13 THE VIDEOGRAPHER:

14 The time now is 2:19. We're off
15 the record -- 12:19 p.m.

16 (Whereupon, a brief recess was
17 taken.)

18 THE VIDEOGRAPHER:

19 The time is 12:38 p.m. We're back
20 on the record.

21 EXAMINATION BY MR. CAMPBELL:

22 **Q.** Sir, I want to go back and try to
23 catch up on some of the knowledge of persons
24 of ordinary skill in the art back, you know,
25 when the patent was filed, which in this



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